

1 Stacey M. Leyton (SBN 203827)  
2 Barbara J. Chisholm (SBN 224656)  
3 Danielle Leonard (SBN 218201)  
4 ALTSHULER BERZON LLP  
5 177 Post Street, Suite 300  
6 San Francisco, CA 94108  
7 Tel: (415) 421-7151  
8 Fax: (415) 362-8064  
9 sleyton@altber.com  
10 bchisholm@altber.com  
11 dleonard@altber.com

12 Elena Goldstein (pro hac vice)  
13 Skye Perryman (pro hac vice)  
14 Tsuki Hoshijima (pro hac vice)  
15 DEMOCRACY FORWARD  
16 FOUNDATION  
17 P.O. Box 34553  
18 Washington, DC 20043  
19 Tel: (202) 448-9090  
20 Fax: (202) 796-4426  
21 egoldstein@democracyforward.org  
22 sperryman@democracyforward.org  
23 thoshijima@democracyforward.org

24 *Attorneys for Plaintiffs*

25 [Additional Plaintiffs' counsel and affiliations listed on signature page]

26 UNITED STATES DISTRICT COURT  
27 NORTHERN DISTRICT OF CALIFORNIA  
28 SAN FRANCISCO DIVISION

29  
30 AMERICAN FEDERATION OF  
31 GOVERNMENT EMPLOYEES, AFL-CIO,  
32 *et al.*

33 Plaintiffs,

34 v.

35 DONALD J. TRUMP, in his official capacity as  
36 President of the United States, *et al.*,

37 Defendants.

38 CRAIG H. MISSAKIAN  
39 United States Attorney  
40 450 Golden Gate Avenue, Box 36055  
41 San Francisco, California 94102-3495  
42 Telephone: (415) 436-7200  
43 Fax: (415) 436-6748

44 ERIC J. HAMILTON (CABN 296283)  
45 Deputy Assistant Attorney General  
46 DIANE KELLEHER  
47 Branch Director  
48 CHRISTOPHER HALL  
49 Assistant Branch Director  
50 ANDREW M. BERNIE  
51 Trial Attorney  
52 Civil Division, Federal Programs Branch  
53 950 Pennsylvania Avenue NW  
54 Washington, DC 20530  
55 Telephone: (202) 514 3511  
56 andrew.bernie@usdoj.gov

57 *Attorneys for Defendants*

58 Case No. 3:25-cv-03698-SI

59 **STIPULATION TO EXTEND TIME TO  
60 RESPOND TO DEFENDANTS' MOTION  
61 TO DISMISS**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate and respectfully request  
 2 that the Court extend for two weeks the time for Plaintiffs to file an opposition to Defendants' Motion  
 3 to Dismiss. In support of this stipulation, the parties state as follows:

4 The parties previously stipulated to a three-week extension for the deadline for Defendants to  
 5 respond to Plaintiffs' amended complaint to July 21, 2025. ECF 175. On July 21, 2025, Defendants  
 6 filed a motion to dismiss Plaintiffs' amended complaint. ECF 216. Plaintiffs' opposition to this  
 7 motion is currently due on August 4, 2025. Civ. L.R. 7-3(a). In light of other deadlines in this case,  
 8 on July 24, 2025, Plaintiffs requested and Defendants have consented to a two week extension on the  
 9 response to the motion to dismiss, until August 18, 2025.

10 DATED: July 29, 2025

Respectfully submitted,

11 Stacey M. Leyton  
 12 Barbara J. Chisholm  
 13 Danielle E. Leonard  
 14 Corinne F. Johnson  
 15 Alice X. Wang  
 16 Robin S. Tholin  
 17 ALTSHULER BERZON LLP  
 18 177 Post St., Suite 300  
 19 San Francisco, CA 94108  
 20 Tel: (415) 421-7151  
 21 sleyton@altshulerberzon.com  
 22 bchisholm@altshulerberzon.com  
 23 dleonard@altshulerberzon.com

24 By: /s/ Danielle Leonard<sup>1</sup>

25 *Attorneys for All Union and Non-Profit Organization  
 26 Plaintiffs*

27  
 28 Elena Goldstein (pro hac vice)  
 29 Skye Perryman (pro hac vice)  
 30 Tsuki Hoshijima (pro hac vice)  
 31 DEMOCRACY FORWARD FOUNDATION  
 32 P.O. Box 34553  
 33 Washington, D.C. 20043  
 34 Tel: (202) 448-9090  
 35 Fax: (202) 796-4426

<sup>1</sup> In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.

1 egoldstein@democracyforward.org  
2 sperryman@democracyforward.org  
3 thoshijima@democracyforward.org

4 By: /s/ Tsuki Hoshijima

---

5 *Attorneys for All Union and Non-Profit Organization*  
6 *Plaintiffs (except NRDC) and for Plaintiffs City of*  
7 *Chicago, IL; Martin Luther King, Jr. County, WA;*  
8 *Harris County, TX; and City of Baltimore, MD*

9 Jules Torti (pro hac vice)  
10 PROTECT DEMOCRACY PROJECT  
11 82 Nassau St., #601  
12 New York, NY 10038

13 Erica J. Newland (pro hac vice)  
14 Jacek Pruski (pro hac vice)  
15 PROTECT DEMOCRACY PROJECT  
16 2020 Pennsylvania Ave., N.W., Suite 163  
17 Washington, D.C. 20006  
18 Tel: 202-579-4582  
19 jules.torti@protectdemocracy.org  
20 erica.newland@protectdemocracy.org  
21 jacek.pruski@protectdemocracy.org

22 By: /s/ Jacek Pruski

---

23 *Attorneys for All Union and Non-Profit Organization*  
24 *Plaintiffs (except NRDC)*

25 Norman L. Eisen (pro hac vice)  
26 Spencer W. Klein (pro hac vice)  
27 STATE DEMOCRACY DEFENDERS FUND  
28 600 Pennsylvania Avenue SE #15180  
Washington, D.C. 20003  
Tel: (202) 594-9958  
Norman@statedemocracydefenders.org  
Spencer@statedemocracydefenders.org

29 By: /s/ Norman L. Eisen

---

30 *Attorneys for All Union and Non-Profit Organization*  
31 *Plaintiffs (except NRDC)*

32 Rushab Sanghvi (SBN 302809)  
33 AMERICAN FEDERATION OF GOVERNMENT  
34 EMPLOYEES, AFL-CIO  
35 80 F Street, NW

1 Washington, D.C. 20001  
2 Tel: (202) 639-6426  
3 Sanghr@afge.org

4 By: /s/ Rushab Sanghvi

---

5 *Attorneys for Plaintiffs American Federation of  
6 Government Employees, AFL-CIO (AFGE) and  
7 AFGE locals*

8 Teague Paterson (SBN 226659)  
9 Matthew Blumin (pro hac vice)  
10 AMERICAN FEDERATION OF STATE,  
11 COUNTY, AND MUNICIPAL EMPLOYEES, AFL-  
12 CIO  
13 1625 L Street, N.W.  
14 Washington, D.C. 20036  
15 Tel: (202) 775-5900  
16 TPaterson@afscme.org  
17 MBlumin@afscme.org

18 By: /s/ Teague Paterson

---

19 *Attorneys for Plaintiff American Federation of State  
20 County and Municipal Employees, AFL-CIO  
21 (AFSCME)*

22 Steven K. Ury (SBN 199499)  
23 SERVICE EMPLOYEES INTERNATIONAL  
24 UNION, AFL-CIO  
25 1800 Massachusetts Ave., N.W.  
26 Washington, D.C. 20036  
27 Tel: (202) 730-7428  
28 steven.ury@seiu.org

29 By: /s/ Steven K. Ury

---

30 *Attorneys for Plaintiff Service Employees  
31 International Union, AFL-CIO (SEIU)*

32 Simi Bhat (SBN 289143)  
33 Katherine K. Desormeau (SBN 266463)  
34 NATURAL RESOURCES DEFENSE COUNCIL  
35 111 Sutter St Fl 21,  
36 San Francisco, CA 94104  
37 Tel: (415) 875-6100  
38 sbhat@nrdc.org  
39 kdesormeau@nrdc.org

1 By: /s/ Simi Bhat

---

2  
3 *Attorneys for Plaintiff Natural Resources Defense*  
*Council*

4 David Chiu (SBN 189542)  
5 City Attorney  
6 Yvonne R. Meré (SBN 175394)  
7 Chief Deputy City Attorney  
8 Mollie M. Lee (SBN 251404)  
9 Chief of Strategic Advocacy  
10 Sara J. Eisenberg (SBN 269303)  
11 Chief of Complex and Affirmative Litigation  
12 Molly J. Alarcon (SBN 315244)  
13 Alexander J. Holtzman (SBN 311813)  
14 Deputy City Attorneys  
15 OFFICE OF THE CITY ATTORNEY FOR THE  
16 CITY AND COUNTY OF SAN FRANCISCO  
17 1390 Market Street, 7th Floor  
18 San Francisco, CA 94102  
19 molly.alarcon@sfcityatty.org  
20 alexander.holtzman@sfcityatty.org

21 By: /s/ Alexander Holtzman

---

22 *Attorneys for Plaintiff City and County of San*  
*Francisco*

23 Tony LoPresti (SBN 289269)  
24 COUNTY COUNSEL  
25 Kavita Narayan (SBN 264191)  
26 Meredith A. Johnson (SBN 291018)  
27 Raphael N. Rajendra (SBN 255096)  
28 Hannah M. Godbey (SBN 334475)  
29 OFFICE OF THE COUNTY COUNSEL  
30 COUNTY OF SANTA CLARA  
31 70 West Hedding Street, East Wing, 9th Floor  
32 San José, CA 95110  
33 Tel: (408) 299-5900  
34 Kavita.Narayan@cco.sccgov.org  
35 Meredith.Johnson@cco.sccgov.org  
36 Raphael.Rajendra@cco.sccgov.org  
37 Hannah.Godbey@cco.sccgov.org

38 By: /s/ Tony LoPresti

---

39 *Attorneys for Plaintiff County of Santa Clara, Calif.*

1 David J. Hackett (pro hac vice)  
2 General Counsel to King County Executive &  
3 Special Deputy Prosecutor  
4 Alison Holcomb (pro hac vice)  
5 Deputy General Counsel to King County Executive  
6 & Special Deputy Prosecutor  
7 Erin King-Clancy (pro hac vice app. forthcoming)  
8 Senior Deputy Prosecuting Attorney  
9 OFFICE OF KING COUNTY PROSECUTING  
10 ATTORNEY LEESA MANION  
11 401 5<sup>th</sup> Avenue, Suite 800  
12 Seattle, WA 98104  
13 (206) 477-9483  
14 David.Hackett@kingcounty.gov  
15 aholcomb@kingcounty.gov  
16 aclancy@kingcounty.gov

17 By: /s/ David J. Hackett

18 *Attorneys for Plaintiff Martin Luther King, Jr.*  
19 *County*

20 Sharanya Mohan (CABN 350675)  
21 PUBLIC RIGHTS PROJECT  
22 490 43rd Street, Unit #115  
23 Oakland, CA 94609  
24 Tel: (510) 738-6788  
25 sai@publicrightsproject.org

26 By: /s/ Sharanya Mohan

27 *Attorney for Plaintiffs Baltimore, MD, Chicago, IL,*  
28 *Harris County, TX, and King County, WA*

1 Christian D. Menefee  
2 Harris County Attorney  
3 Jonathan G.C. Fombonne (pro hac vice)  
4 Deputy County Attorney and First Assistant  
5 Tiffany Bingham (pro hac vice app. forthcoming)  
6 Managing Counsel  
7 Sarah Utley (pro hac vice app. forthcoming)  
8 Division Director – Environmental Division  
9 Bethany Dwyer (pro hac vice app. forthcoming)  
10 Deputy Division Director - Environmental Division  
11 R. Chan Tysor (pro hac vice app. forthcoming)  
12 Senior Assistant County Attorney  
13 Alexandra “Alex” Keiser (pro hac vice)  
14 Assistant County Attorney  
15 1019 Congress, 15th Floor  
16 Houston, Texas 77002  
17 Tel: (713) 274-5102  
18 Fax: (713) 437-4211

jonathan.fombonne@harriscountytx.gov  
tiffany.bingham@harriscountytx.gov  
sarah.utley@harriscountytx.gov  
bethany.dwyer@harriscouptytx.gov  
chan.tysor@harriscountytx.gov  
alex.keiser@harriscountytx.gov

By: /s/ Jonathan G.C. Fombonne

*Attorneys for Plaintiff Harris County, Texas*

Mary B. Richardson-Lowry,  
Corporation Counsel of the City of Chicago  
Stephen J. Kane (IL ARDC 6272490) (pro hac vice  
app. forthcoming)  
Rebecca A. Hirsch (IL ARDC 6279592) (pro hac  
vice)  
Lucy Prather (IL ARDC 6337780) (pro hac vice)  
City of Chicago Department of Law,  
Affirmative Litigation Division  
121 N LaSalle Street, Suite 600  
Chicago, Illinois 60602  
Tel: (312) 744-6934  
Stephen.kane@cityofchicago.org  
Rebecca.Hirsch2@cityofchicago.org  
Lucy.Prather@cityofchicago.org

By: /s/ Stephen J. Kane

*Attorneys for Plaintiff City of Chicago*

Ebony M. Thompson  
Baltimore City Solicitor  
Sara Gross (pro hac vice app. forthcoming)  
Chief of Affirmative Litigation  
Baltimore City Department of Law  
100 N. Holliday Street  
Baltimore, Maryland 21202  
Tel: (410) 396-3947  
[sara.gross@baltimorecity.gov](mailto:sara.gross@baltimorecity.gov)

By: /s/ Sara Gross

*Attorneys for Plaintiff City of Baltimore*

CRAIG H. MISSAKIAN  
United States Attorney  
U.S. ATTORNEY'S OFFICE  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495

1 ERIC J. HAMILTON (CABN 296283)  
2 Deputy Assistant Attorney General  
3 DIANE KELLEHER  
4 Branch Director  
5 CHRISTOPHER HALL  
6 Assistant Branch Director

7 s/ Andrew M. Bernie  
8 Andrew M. Bernie  
9 950 Pennsylvania Avenue NW  
10 Washington, DC 20530  
11 Telephone: (202) 514-3511  
12 andrew.bernie@usdoj.gov

13 *Counsel for Defendants*

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28